



PAUL F. KENEALLY, PARTNER  
(585) 258-2882  
pkeneally@underbergkessler.com

November 21, 2018

***VIA E-MAIL AND FIRST-CLASS MAIL***

Brian C. Brook, Esq.  
Daryoush Behbood, Esq.  
Clinton Brook & Peed  
85 Broad Street, Fl. 16  
New York, NY 10004

**RE: Daniel Kleeberg, Lisa Stein and Audrey Hays v. Lester Eber, et al.  
Civ. Action No.: 16-cv-9517**

Dear Messrs. Brook and Behbood:

Please allow the following to serve as a partial response to Mr. Behbood's October 19, 2018 letter.

Response to Kleeberg's First Set of Interrogatories (Nos. 2,3, & 7) to Wendy Eber:

Supplemental Response to Interrogatories 2 and 3:

- **Eber CT**  
Vice President: 2008- 2013; President 2013 to present
- **Eber Bros. W&L Corp.**  
Division Account Manager 2001-2005  
Sales Manager 2005-2007  
Financial Analyst 2007-2008
- **Pegasystems, Inc.**  
Product Manager 1998-2001
- **M&T Bank**  
Product Manager 1995-1998
- **Kodak**  
Summer Intern 1994



Brian C. Brook, Esq.  
November 21, 2018  
Page | 2

- **Emerald Capital**  
Analyst: 1992-1993
- **Alumax**  
Auditor 1990-1992
- **Deloitte and Touche**  
Auditor 1989-1990

In addition, enclosed please find Bates Nos. EB-00032632 - EB-00033269. Please note that this production contains documents relating to the 2005 acquisition of Slocum (responsive to Plaintiffs' Third Request for Production to Eber Defendants), as well as documents relating to the Benderson, Wolf Concept, and D4 litigation. Please note that we view the Slocum documents to be almost entirely irrelevant to this litigation, but have elected to produce them nonetheless.

We will supplement the response to the October 19<sup>th</sup> letter as soon as possible

Very truly yours,

  
Paul F. Keneally

PFK/mds  
Enclosure

cc: Michael J. Adams, Esq. (w/ enc. via e-mail & First-Class Mail)  
Robert B. Calihan, Esq. (w/ enc. via e-mail & First-Class Mail)